

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re U. S. Steel Consolidated Cases

Civil Action No. 17-579

Judge Cathy Bissoon

**LEAD COUNSEL'S MOTION FOR AWARD OF ATTORNEYS' FEES AND
LITIGATION EXPENSES, AND SERVICE AWARDS TO PLAINTIFFS PURSUANT TO
15 U.S.C. §78u-4(a)(4)**

Lead Counsel respectfully submits this Motion for Award of Attorneys' Fees and Litigation Expenses, and Service Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4) for counsel and Plaintiffs' work on behalf of the Class in achieving the proposed Settlement. As set forth more fully in Plaintiffs' accompanying Motion for Final Approval of Class Action Settlement and Plan of Allocation and accompanying memorandum of law, the \$40 million Settlement represents an excellent result for the Settlement Class and is the result of nearly five years of hard-fought litigation.

Lead Counsel's request for an award for attorneys' fees of one-third of the common fund, or \$13,333,333.33, represents a .81 negative multiplier of Plaintiffs' Counsel's lodestar and is well within the range approved in similar securities class action cases at this stage of the proceedings (litigated through merits and expert discovery). Lead Counsel also requests payment of expenses incurred in connection with the prosecution of this litigation in the aggregate amount of \$2,711,338.12, which were reasonable and necessary to Plaintiffs' prosecution of the claims and achieving the Settlement and are of the type routinely approved in securities class actions.

Finally, Lead Plaintiff Vrakas and additional Plaintiff Reed seek awards of \$70,000 and \$10,000, respectively, for a total of \$80,000, in connection with their representation of the Class

pursuant to 15 U.S.C. §78u-4(a)(4). These requests are fair and reasonable, and within the range of fees, expenses, and class representative awards typically granted in similar matters.

As of the date of this motion, there have been to objections to the requested fee award, expenses, or service awards to Plaintiffs. Plaintiffs have conferred with the U. S. Steel Defendants, through counsel, and the U. S. Steel Defendants take no position on Lead Counsel's request for attorneys' fees and/or Litigation Expenses and/or any award to pay the costs and expenses of Plaintiffs.

Plaintiffs' Motion is supported by the accompanying Memorandum of Law in Support of Motion for Award of Attorneys' Fees and Litigation Expenses, and Service Awards to Plaintiffs Pursuant to 15 U.S.C. §78u-4(a)(4), the Declaration of Shannon L. Hopkins and accompanying exhibits and all other filings in the record. Plaintiffs further submit a proposed order herewith.

DATED: February 6, 2023

Respectfully submitted,

LEVI & KORSINSKY, LLP

By: /s/ Shannon L. Hopkins
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*Lead Counsel for Plaintiffs Christakis Vrakas and
Leeann Reed and Lead Counsel for the Class*

-and-

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2023, I served a copy of the foregoing document on all appearing counsel through the Court's ECF system.

/s/ Shannon L. Hopkins
Shannon L. Hopkins